

# EXHIBIT C

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*Attorneys for Defendant, American Airlines, Inc.*

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

Sean Bennett, an individual,

Plaintiff,

vs.

City of Phoenix, a governmental entity;  
 American Airlines, Inc., a foreign  
 corporation; Officer Joel Cottrell and Jane  
 Doe Cottrell, a married couple; Officer  
 Benjamin Denham and Jane Doe Denham, a  
 married couple; Officer Todd Blanc and Jane  
 Doe Blanc, a married couple; Officer Peru  
 and Jane Doe Peru, a married couple;  
 Sergeant Hogan and Jane Doe Hogan, a  
 married couple;

Defendant(s).

Case No. 2:23-cv-02425-ROS--DMF

**DECLARATION OF ERYN  
 SCANNELL IN SUPPORT OF  
 DEFENDANT AMERICAN  
 AIRLINES' MOTION FOR  
 SUMMARY JUDGMENT**

Honorable Judge: Roslyn O. Silver  
 Magistrate Judge: Deborah M. Fine

I, Eryn Scannell, declare as follows:

1. I am over the age of eighteen (18) and make this declaration in support of American Airlines' Motion for Summary Judgment. I have personal knowledge of the facts set forth herein and, if called upon, I can and will testify competently as follows:

1           2.       On August 13, 2021, I was a passenger on American Airlines Flight 2391  
2 from Phoenix, Arizona, to Anchorage, Alaska.

3           3.       After boarding the aircraft and taking my assigned seat, I observed a male  
4 passenger board the aircraft while chewing tobacco and spitting into a cup. He repeatedly  
5 pulled down his mask while doing so. A flight attendant instructed him to discard the cup  
6 and to keep his mask on. At that time, airline policy required passengers to wear masks  
7 during flights. The man appeared frustrated by this instruction and spoke loudly about it  
8 when he sat down.

9           4.       The man appeared to be under the influence of something—likely alcohol,  
10 based on his behavior. Initially, he was seated in the aisle seat directly in front of me  
11 (diagonally across the aisle). A flight attendant asked him to move to the seat on the  
12 opposite side of the aisle, stating it was for training purposes. The man complied but  
13 needed repeated reminders to wear his mask and fasten his seat belt.

14           5.       When flight attendants told him to fasten his seat belt, he refused. Another  
15 flight attendant told him, “You have to put it on, or we cannot leave.” He was disrespectful  
16 toward the flight attendants. Shortly after the flight attendant walked away, the man moved  
17 back to his original seat.

18           6.       When the flight attendant returned, she again asked him to move. The man  
19 stood up, turned toward the rear of the plane (in my direction), and began shouting.

20           7.       The man identified himself as Sean Bennett—he shouted his name multiple  
21 times so everyone could hear. He stated that he was in the military, that he had fought for  
22 our country, and that he had received a Silver Star. It was as if he were shouting his résumé  
23 to the passengers. Everyone around me appeared confused as to why he was yelling, and  
24 the situation was escalating quickly. The people near me, including myself, were nervous  
25 about what might happen next.

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1           8. I began recording a video on my cell phone of Mr. Bennett shouting while he  
2 was being escorted off the aircraft. I recorded discreetly from behind my seat because I  
3 feared he might see me filming, which I thought could further escalate his behavior. A true  
4 and correct copy of this video, recorded on August 13, 2021, is attached hereto as **Exhibit**  
5 **A**.

6           9. Mr. Bennett appeared angry, defiant, and volatile. I have never before  
7 witnessed a passenger behaving this way on a flight. From my observations, the flight  
8 attendants did nothing to provoke his reaction. Their requests for him to wear a mask and  
9 fasten his seatbelt were standard requirements on all flights during the COVID period. The  
10 situation escalated rapidly, and passengers, including myself, were visibly anxious.

11           10. The flight attendants appeared to call for assistance, and Mr. Bennett was  
12 soon escorted off the aircraft. Another man—apparently an active or retired member of the  
13 military—assisted in removing him. Without that assistance, I do not believe Mr. Bennett  
14 would have left the plane.

15           11. I would not have felt safe if Mr. Bennett had remained on board. In my  
16 opinion, the flight attendants handled the situation appropriately and professionally. I  
17 travel frequently and have done so since childhood. Based on my observations, the crew's  
18 response to Mr. Bennett's behavior was reasonable and well-managed.

19           I declare under penalty of perjury, under the laws of the United States, that the  
20 foregoing is true and correct. Executed on November <sup>11/24/2025</sup> \_\_, 2025, at Tempe (City),  
21 Arizona (State).

22           DocuSigned by:  
  
23           Eryn Scannell  
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